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From: Scott.Zuniga@mizkan.com%inter2 [Scott.Zuniga@mizkan.com] on behalf of Scott.Zuniga@mizkan.com
Sent: Monday, August 15, 2005 2:40 PM
To: National List
Subject: National List Comments - Sunset Review Process
Attachments: ATTACHMENT.TXT

Arthur Neal, Director, Program Administration
 National Organic Program
 USDA-AMS-TMP-NOP
 1400 Independence Ave., SW., Room 4008
 So.Ag Stop 0268
 Washington, DC 20250

Dated: August 15, 2005

Via E-mail: National.List@usda.gov
 Via Fax: (202) 205 -7808

Dear Mr. Neal and the National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket Number TM-04-07. Mizkan Americas supports the continued allowance of the following substance(s):

Citric Acid, as found in National List Section #205.605(a) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))." This material is critically important as an acidulant in control of the pH level of processed foods to prevent the growth of pathogenic bacteria and food preservation.

Bentonite and Diatomaceous Earth, as found in National List Section #205.605(a) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))." These two substances are used as Filtration Aids for filtering a variety of liquid food products and as such no suitable alternatives exist. Without these materials filtration / clarification would be virtually impossible. They have been used historically for more than fifty years.

Calcium Carbonate, as found in National List Section #205.605(a) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food groups(s))." This substance provides a source of calcium as needed for fermentation aids.

Magnesium Sulfate, as found in National List Section #205.605(a) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients or food group(s))." This substance provides a source of magnesium as needed for fermentation aids.

Yeast, as found in National List Section #205.605(a) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients of food group(s))." This substance provides flavorings and multiple nutrients in baking, brewing when used in food products as well as needed for fermentation aids.

Calcium Phosphates, as found in National List Section #205.605(b) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients of food group(s))." This substance provided a source of Calcium and Phosphate is needed for fermentation aids.

Chlorine materials, as found in National List Section #205.605 (b) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified

ingredients of food group(s))."

These substances are critically needed for sanitizing food contact surfaces and as such there is no suitable alternative for these materials in this classification.

Magnesium Chloride, as found in National List Section #205.605(b) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients of food group(s))."

This substance provides a source of magnesium as needed for fermentation aids.

Potassium Carbonate, as found in National List Section #205.605(b) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients of food group(s))."

This substance provides a source of Potassium as needed for fermentation aids.

Sodium Hydroxide, as found in National List Section #205.605(b) Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specified ingredients of food group(s))."

This substance is critically needed as a cleaning agent for food processing equipment and is only one of a very few currently allowed for this purpose.

Sincerely,

Scott Zuniga
R & D Manager
Mizkan Americas Inc.